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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

JOHN DOE, *et al.*,

Plaintiffs,

v.

DONALD TRUM, in his official capacity as
President of the United States of America, *et al.*,

Defendants.

Case No. 4:25-cv-03140 JSW

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS' RESPONSE TO PLAINTIFFS'
COMPLAINT; AND ~~PROPOSED~~ ORDER**

Plaintiffs and Defendants hereby stipulate and respectfully request the Court to extend the deadline for Defendants' response to Plaintiffs' complaint. Defendants will file their response on or before July 14, 2025. The parties make this request because Defendants need a brief period of additional time to prepare their response to the complaint.

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1 Dated: June 13, 2025

Respectfully submitted,¹

2 CRAIG H. MISSAKIAN
3 United States Attorney

4 /s/ Elizabeth D. Kurlan
5 ELIZABETH D. KURLAN
6 Assistant United States Attorney
7 Attorneys for Defendants

8 Dated: June 13, 2025

9 /s/ Zachary Nightingale
10 ZACHARY NIGHTINGALE
11 JOHN N. SINODIS
12 Attorneys for Plaintiffs

13 ~~[PROPOSED]~~ ORDER

14 Pursuant to stipulation, IT IS SO ORDERED. Defendants will file their response to Plaintiffs'
15 complaint by July 14, 2025.

16 Date: June 18, 2025

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18 JEFFREY S. WHITE
19 United States District Judge
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27 ¹ In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all
28 signatories listed herein concur in the filing of this document.

DECLARATION OF ELIZABETH D. KURLAN

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On April 4, 2025, Plaintiffs filed a complaint in which they challenge the termination of their records in the Student Exchange and Visitor Information System. *See* Dkt. No. 1. Our office was served with the complaint on April 11, 2025.

3. On June 10, 2025, I contacted Plaintiffs' counsel regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiffs consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 10, 2025

/s/ Elizabeth D. Kurlan
ELIZABETH D. KURLAN
Assistant United States Attorney